

# Federal Defenders OF NEW YORK, INC.

Southern District  
52 Duane Street-10th Floor, New York, NY 10007  
Tel: (212) 417-8700 Fax: (212) 571-0392

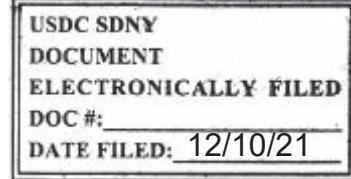
David E. Patton  
Executive Director  
and Attorney-in-Chief

Southern District of New York  
Jennifer L. Brown  
Attorney-in-Charge

December 10, 2021

**By ECF**

Honorable Alison J. Nathan  
United States District Judge  
Southern District of New York  
40 Foley Square  
New York, NY 10007



**Re: *United States v. Osama Ahmed Abdellatif El Mokadem, a/k/a Armin De Goorte, 19 Cr. 646 (AJN)***

Dear Judge Nathan:

I write on behalf of Armin de Goorte, without objection from Pretrial Services or the Government, to request a bail modification permitting Mr. de Goorte to use an electronic device and access the internet for the limited purpose of searching and applying for jobs.

On June 26, 2020, the Court imposed bail conditions for Mr. de Goorte including home incarceration and a prohibition against accessing the internet or using any internet-enabled device (other than for videoconferencing with Pretrial Services). ECF No. 55. On November 18, 2021, the Court granted a requested modification to Mr. de Goorte's bail conditions from home incarceration—which allowed him to leave home only for court, counsel meetings, and necessary medical services—to home detention—which permits him to seek and maintain employment. ECF No. 102. On December 2, 2021, Pretrial Services informed the undersigned counsel that supervisees on home detention may only apply for jobs online, not by searching or applying in person. Pretrial indicated that for Mr. de Goorte to get the benefit of home detention status, he would need another bail modification allowing him to use the internet and a computer for job searches.

SO ORDERED.

Accordingly, I request that the Court modify the terms of Mr. de Goorte's bail to allow use of electronic devices and the internet for the limited purpose of searching and applying for jobs. Pretrial Services takes no position on the request, and the Government has no objection to it. Thank you for considering it.

*[Signature]*  
12/10/21

Respectfully submitted,

/s/ Ariel Werner  
Ariel Werner  
Assistant Federal Defender  
917-751-2050

cc: Andrew Rohrbach, Assistant U.S. Attorney  
Courtney DeFeo, U.S. Pretrial Services Officer